

**From:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)  
**To:** [Leach, Robert \(USACAN\)](mailto:Leach, Robert (USACAN))  
**Cc:** [Margen, Beth \(USACAN\)](mailto:Margen, Beth (USACAN)); [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com); [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); [Reeves, Adam \(USACAN\)](mailto:Reeves, Adam (USACAN)); [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com); [Green, Kristina \(USACAN\)](mailto:Green, Kristina (USACAN)); [Abrahamson, Zachary \(ATR\)](mailto:Abrahamson, Zachary (ATR))  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch  
**Date:** Friday, November 24, 2023 2:56:13 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

Dear Bob,

Thank you very much for this information. We will work to identify the Bates ranges of documents in the green highlighted rows below. We will also keep an eye out for the reproductions via USAfx of the blue highlighted rows below.

Best regards,  
 Kylie McLaughlin  
 Associate  
 CLIFFORD CHANCE US LLP  
 31 West 52<sup>nd</sup> Street  
 New York, NY 10019  
 Direct: +1 212-880-5725  
 Mobile: +1 646-512-4892  
[kylie.mclaughlin@cliffordchance.com](mailto:kylie.mclaughlin@cliffordchance.com)

**From:** Leach, Robert (USACAN) <Robert.Leach@usdoj.gov>  
**Sent:** Friday, November 24, 2023 5:48 PM  
**To:** McLaughlin, Kylie (Litigation-NY) <Kylie.McLaughlin@CliffordChance.com>  
**Cc:** Margen, Beth (USACAN) <Beth.Margen@usdoj.gov>; Bouknight, George (Litigation-NY) <George.Bouknight@CliffordChance.com>; Green, Oriane (Litigation-NY) <Oriane.Green@CliffordChance.com>; Keats, Trish (Litigation-NY) <Trish.Keats@CliffordChance.com>; Reeves, Adam (USACAN) <Adam.Reeves@usdoj.gov>; Morvillo, Christopher (Regulatory/White Collar-NY) <Christopher.Morvillo@CliffordChance.com>; Green, Kristina (USACAN) <Kristina.Green@usdoj.gov>; Abrahamson, Zachary (ATR) <Zachary.Abrahamson@usdoj.gov>  
**Subject:** FW: [EXT] RE: US v. Lynch

Dear Kyle,

Thank you for your message. We appreciate you bringing these issues to our attention. Please see the highlights of the table below. For the rows highlighted in green, we need additional information such as the Bates range of the documents. It is not obvious to us based on our initial review what production folder the documents came from. For the rows highlighted in yellow, these were produced from a hard-drive received from HP of documents from the UK litigation. I understand we imaged or copied the entire drive for you, so if there is an empty folder, I expect the government never received the documents. To avoid all doubt, we invite you to inspect the hard-drive we received and make your own assessment. (I also understand these are documents available to Dr. Lynch in the UK civil case.) Finally, for the rows highlighted in blue, we will reproduce them via USAfx promptly.

As always, please let me know promptly of any issues you have with the discovery so we can work to resolve them.

Best regards,  
 Bob

**From:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>  
**Sent:** Wednesday, November 22, 2023 6:56:21 PM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doi.gov](mailto:BMargen@usa.doi.gov)>; [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Leach, Robert (USACAN) <[RLeach@usa.doi.gov](mailto:RLeach@usa.doi.gov)>  
**Cc:** [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Reeves, Adam (USACAN) <[AReves@usa.doi.gov](mailto:AReves@usa.doi.gov)>; [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Green, Kristina (USACAN) <[KGreen1@usa.doi.gov](mailto:KGreen1@usa.doi.gov)>  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

I hope you're doing well!

We have identified issues with aspects of the government's productions to Dr. Lynch that require your assistance to resolve.

First, as we have been processing the voluminous productions received from the government, it has recently come to our attention that a significant amount of the discovery appears to be missing natives, images, and text files, and thus are unreviewable for us. In total, this issue affects 3,372,880 documents. In the chart below, we have listed out the volumes affected, the total number of "issue" documents from each volume, and the total number of documents in each volume. With respect to these files, we understand (from our vendor) that the problem appears to be that the below productions were produced in "load-ready" format with load files and the typical accompanying folder structure that should hold natives, images, and text files for all documents in a given production. However, the folders that should hold the natives, images, and text files are actually empty for us. Thus, we have data regarding what these documents *should* be thanks to the load files for each of the below productions, but we do not have the documents themselves.

Please let us know if we can provide any other information to help you identify these productions on your end. We ask that you produce these volumes with the missing files to enable our review as soon as possible.

VOLUME	Issue Documents	Total Documents in Production
USAO-SEC-EPROD_20170517	2,366,650	2,430,324
Autonomy Data Transfer - Tranche 9	380,837	446,839
Post-Acquisition Disclosure - Tranche 2	337,979	340,717
USAO-SEC-EPROD_20170517_2	123,499	147,377
Post-Acquisition Disclosure - Tranche 1	103,601	103,636
Legacy Autonomy Data Dump - Tranche 10	41,088	145,058
FT003	14,485	29,192
FT004	2,679	5,388
SEC-AUSA4_20140624	514	46,160
SF-03853_discs1-4	371	14,757
Pre-Acquisition Disclosure - Tranche 3	333	1,172
PROD-0005	237	417,315
2017 06 26 - MIXED Disclosure (PRA & POS)	125	274
PROD-0010	72	485,433
PROD-0007	62	453,786
PROD-0002	62	523,088
Post-Acquisition Disclosure - Tranche 1_VAR Software Availability	62	84
SEC-AUSA5-EPROD_20150424	46	126,311
PROD-0004	36	561,334
HP-SEC-185	29	17,926
PROD-0009	27	521,002
FT001	27	66
PROD-0006	20	518,664
PROD-0003	11	507,499
PROD-0012	7	468,943
BAT0066	5	111
NULL	5	1,691,396
PROD-0008	3	487,600
FT002	3	18
BAT0121	1	1,418
HP-SEC-186	1	31
PROD-0020	1	524,282
PRESENTATION_PT00078728	1	206
PROD-0011	1	531,199

Second, it has also come to our attention that various productions have gaps in Bates ranges and thus we do not have the complete Bates range for such productions, as represented by the production indices we received. The attached chart represents the gaps in Bates ranges that our vendor has identified for us.

We ask that you either confirm that these missing ranges were intentionally omitted from the productions (and, if so, why) or produce these missing Bates ranges to us as soon as possible.

Thank you very much in advance for your help. Wishing you a Happy Thanksgiving!

Best regards,  
Kylie McLaughlin  
Associate  
CLIFFORD CHANCE US LLP  
31 West 52<sup>nd</sup> Street  
New York, NY 10019  
Direct: +1 212-880-5725  
Mobile: +1 646-512-4892  
[Kylie.mclaughlin@cliffordchance.com](mailto:Kylie.mclaughlin@cliffordchance.com)

---

**From:** Margen, Beth (USACAN) <[RBeth.Margen@usdoj.gov](mailto:RBeth.Margen@usdoj.gov)>  
**Sent:** Thursday, October 19, 2023 10:14 AM  
**To:** Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>; Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Green, Kristina (USACAN) <[Kristina.Green@usdoj.gov](mailto:Kristina.Green@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Yes, that's correct. Thank you.

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**From:** [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>  
**Sent:** Thursday, October 19, 2023 6:27 AM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doi.gov](mailto:BMargen@usa.doi.gov)>; [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doi.gov](mailto:RLeach@usa.doi.gov)>  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); Reeves, Adam (USACAN) <[AREeves@usa.doi.gov](mailto:AREeves@usa.doi.gov)>; [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com); Green, Kristina (USACAN) <[KGreen1@usa.doi.gov](mailto:KGreen1@usa.doi.gov)>  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

Just to confirm: Are you saying that the contents within the four (4) password protected zip files are already provided (unextracted) in the same root folders?

Thanks,

George

George Bouknight  
Practice Technology Analyst  
**CLIFFORD CHANCE US LLP**  
31 W. 52nd Street  
NEW YORK, NY 10019  
Direct Dial: (212) 878-3398  
Fax: (212) 878-8376



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**From:** Margen, Beth (USACAN) <[RBeth.Margen@usdoj.gov](mailto:RBeth.Margen@usdoj.gov)>  
**Sent:** Wednesday, October 18, 2023 7:59 PM  
**To:** Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>; Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Green, Kristina (USACAN) <[Kristina.Green@usdoj.gov](mailto:Kristina.Green@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Hi Oriane – following up on below items – I don't think you need the password for the .zip folder because it was unzipped and all the content of that PASSWORD PROTECTED .ZIP are included on that SAME FOLDER that the .zip file located.

I've looked on the content of the .zip folders (BY THEIR TITLE AND SIZE) identified below and COMPARE it with the documents included on that SAME folder, and found out that they are the same.

Thanks,

1. REPRODUCTION002 - 2023.10.02\UK\_LITIGATION - DVD\UK\_LITIGATION - DVD\UK Civil Action Production – Vol 1\2. Hussain - Documents provided to Hussain as referred to in pleadings\2A. POC (sent on 22 May 2015)  
**HP - POC Doc Requests Simmons.zip**
2. REPRODUCTION002 - 2023.10.02\UK\_LITIGATION - DVD\UK\_LITIGATION - DVD\UK Civil Action Production – Vol 1\1. Lynch - Documents provided to Lynch as referred to in pleadings\2A. POC (sent on 22 May 2015)  
**HP - POC Doc Requests Clifford Chance.zip**
3. REPRODUCTION002 - 2023.10.02\UK\_LITIGATION - DVD\UK\_LITIGATION - DVD\UK Civil Action Production – Vol 1\1. Lynch - Documents provided to Lynch as referred to in pleadings\1. LBA  
**HP - Lynch Request.zip**
4. REPRODUCTION002 - 2023.10.02\UK\_LITIGATION - DVD\UK\_LITIGATION - DVD\UK Civil Action Production – Vol 1\2. Hussain - Documents provided to Hussain as referred to in pleadings\3. Valuation Models\6. Valuation Model (sent on 20 August 2015)  
**HP.zip**

---

**From:** Margen, Beth (USACAN)  
**Sent:** Monday, October 16, 2023 3:19 PM  
**To:** [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com); [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doi.gov](mailto:RLeach@usa.doi.gov)>  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); Reeves, Adam (USACAN) <[AREeves@usa.doi.gov](mailto:AREeves@usa.doi.gov)>; [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com); Green, Kristina (USACAN) <[KGreen1@usa.doi.gov](mailto:KGreen1@usa.doi.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Hello Oriane – I don't have an update yet, except for the location of the range of documents below in red.

Thanks,

---

**From:** [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>  
**Sent:** Monday, October 16, 2023 8:03 AM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doi.gov](mailto:BMargen@usa.doi.gov)>; [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doi.gov](mailto:RLeach@usa.doi.gov)>  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); Reeves, Adam (USACAN) <[AREeves@usa.doi.gov](mailto:AREeves@usa.doi.gov)>; [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com); Green, Kristina (USACAN) <[KGreen1@usa.doi.gov](mailto:KGreen1@usa.doi.gov)>  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

I hope you had a nice weekend. I'm just checking to see if you had any follow-up regarding:

1. The passwords that we're still currently missing;
2. Copies of the laptops;
3. The documents in your chart that were highlighted in yellow and identified as "pending":

HP-SEC-01504886		Hewlett-Packard	Native file of an .edc file. Encrypted version of the spreadsheet HP was able to decrypt on 11/19/14 and produce to JH via email as HP-SEC-01504886		2023.06.16. Index of Produced Documents	PENDING
HP-SEC-01592914	HP-SEC-01593910	Hewlett-Packard	Communication and information relevant to former and current Autonomy employees and former and current HP employees		2023.06.16. Index of Produced Documents	INCLUDED IN FOLDER HP-SEC-097, FROM INTIAL PRODUCTION 5/20/2023

We'd appreciate any information you have as to when you think we'll receive these materials. Thanks!

Best,  
Oriane

Direct Dial: +1 (212) 878-8052  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

**From:** Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)>  
**Sent:** Friday, October 6, 2023 12:42 PM  
**To:** Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>; Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Green, Kristina (USACAN) <[Kristina.Green@usdoj.gov](mailto:Kristina.Green@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Thanks George - we need to go back to the origin, since that's the only password I have in my notes, we'll get back to you on that.

Best,

**From:** [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>  
**Sent:** Friday, October 6, 2023 9:33 AM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>; [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); Reeves, Adam (USACAN) <[ADReeves@usa.doj.gov](mailto:ADReeves@usa.doj.gov)>; [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com); Green, Kristina (USACAN) <[KGreen1@usa.doj.gov](mailto:KGreen1@usa.doj.gov)>  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

Unfortunately, the Team reported that for below mentioned 4 zip files the password is not working.

Please provide password(s) to proceed further.

1. REPRODUCTION002 - 2023.10.02\UK\_LITIGATION - DVD\UK\_LITIGATION - DVD\UK Civil Action Production – Vol 1\2. Hussain - Documents provided to Hussain as referred to in pleadings\2A. POC (sent on 22 May 2015)  
**HP - POC Doc Requests Simmons.zip**
2. REPRODUCTION002 - 2023.10.02\UK\_LITIGATION - DVD\UK\_LITIGATION - DVD\UK Civil Action Production – Vol 1\1. Lynch - Documents provided to Lynch as referred to in pleadings\2A. POC (sent on 22 May 2015)  
**HP - POC Doc Requests Clifford Chance.zip**
3. REPRODUCTION002 - 2023.10.02\UK\_LITIGATION - DVD\UK\_LITIGATION - DVD\UK Civil Action Production – Vol 1\1. Lynch - Documents provided to Lynch as referred to in pleadings\1. LBA  
**HP - Lynch Request.zip**
4. REPRODUCTION002 - 2023.10.02\UK\_LITIGATION - DVD\UK\_LITIGATION - DVD\UK Civil Action Production – Vol 1\2. Hussain - Documents provided to Hussain as referred to in pleadings\3. Valuation Models\6. Valuation Model (sent on 20 August 2015)  
**HP.zip**

Thanks,

George

George Bouknight  
Practice Technology Analyst  
**CLIFFORD CHANCE US LLP**  
31 W. 52nd Street  
NEW YORK, NY 10019  
Direct Dial: (212) 878-3398  
Fax: (212) 878-8375



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**From:** Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)>  
**Sent:** Thursday, October 5, 2023 7:24 PM  
**To:** Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>; Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Green, Kristina (USACAN) <[Kristina.Green@usdoj.gov](mailto:Kristina.Green@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Can you check if this password works: N99adr

Thanks,

**From:** [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>  
**Sent:** Thursday, October 5, 2023 9:21 AM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>; [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); Reeves, Adam (USACAN) <[ADReeves@usa.doj.gov](mailto:ADReeves@usa.doj.gov)>; [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com); Green, Kristina (USACAN) <[KGreen1@usa.doj.gov](mailto:KGreen1@usa.doj.gov)>  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

The "UK\_LITIGATION - DVD.ZIP" that we received contains 22 inside zips and all are password protected. Please provide passwords to proceed with extraction.

Thanks,

George

George Bouknight  
Practice Technology Analyst  
**CLIFFORD CHANCE US LLP**  
31 W. 52nd Street  
NEW YORK, NY 10019  
Direct Dial: (212) 878-3398  
Fax: (212) 878-8375



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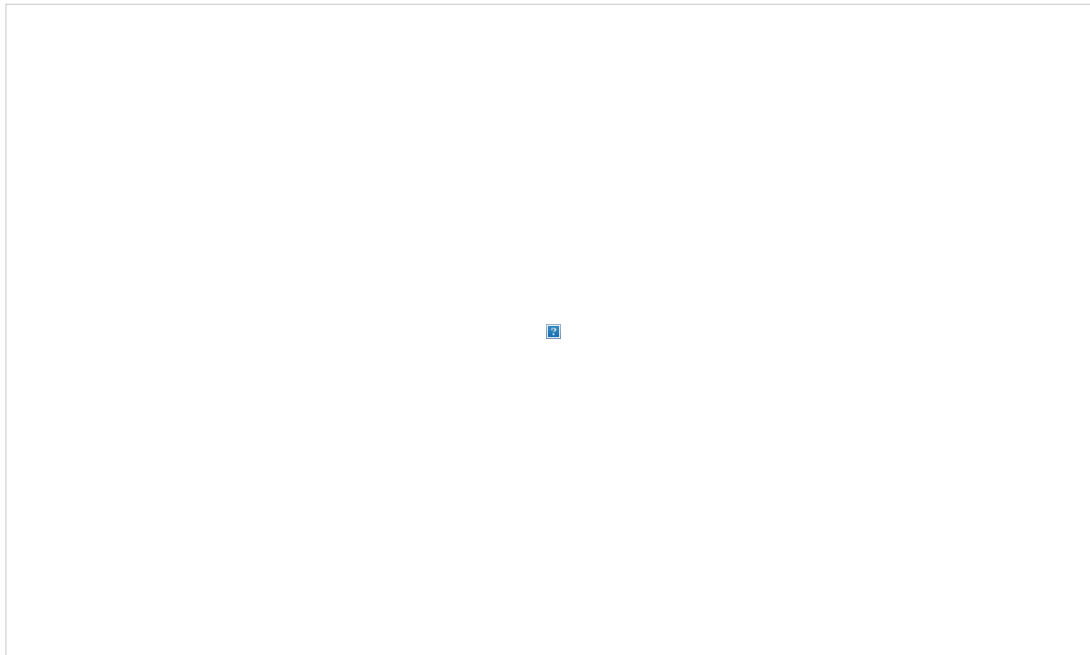
**From:** Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)>  
**Sent:** Tuesday, October 3, 2023 6:32 PM  
**To:** Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>; Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Green, Kristina (USACAN) <[Kristina.Green@usdoj.gov](mailto:Kristina.Green@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Hi George - I've move them to a new folder, see if that one works.

**From:** [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>  
**Sent:** Tuesday, October 3, 2023 3:07 PM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>; [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); Reeves, Adam (USACAN) <[AREeves@usa.doj.gov](mailto:AREeves@usa.doj.gov)>; [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com); Green, Kristina (USACAN) <[KGreen1@usa.doj.gov](mailto:KGreen1@usa.doj.gov)>  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

Unfortunately, I continue to receive the error message. Please let us know if there something else we should try. Thanks!



Regards,

George

George Bouknight  
Practice Technology Analyst  
**CLIFFORD CHANCE US LLP**  
31 W. 52nd Street  
NEW YORK, NY 10019  
Direct Dial: (212) 878-3398  
Fax: (212) 878-8375



Go green. Please don't print this e-mail unless you really need to

**From:** Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)>  
**Sent:** Tuesday, October 3, 2023 5:29 PM  
**To:** Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>; Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Green, Kristina (USACAN) <[Kristina.Green@usdoj.gov](mailto:Kristina.Green@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Let me reinvite Trish and George, see if that fixes.

**From:** [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>  
**Sent:** Tuesday, October 3, 2023 1:28 PM  
**To:** Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>; Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com); Reeves, Adam (USACAN) <[AREeves@usa.doj.gov](mailto:AREeves@usa.doj.gov)>; [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com); Green, Kristina (USACAN) <[KGreen1@usa.doj.gov](mailto:KGreen1@usa.doj.gov)>  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Bob and Beth,

Thanks so much.

Beth – we're having trouble accessing the materials through the link you provided. My colleague George in our IT group has contacted you separately about the issue, but I just wanted to flag it here as well.

Best,  
Oriane

Direct Dial: +1 (212) 878-8052  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

**From:** Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>  
**Sent:** Monday, October 2, 2023 6:26 PM

To: Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:BMargen@usdoj.gov)>; Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>

Cc: McLaughlin, Kyle (Litigation-NY) <[Kyle.McLaughlin@CliffordChance.com](mailto:Kyle.McLaughlin@CliffordChance.com)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>; Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Green, Kristina (USACAN) <[Kristina.Green@usdoj.gov](mailto:Kristina.Green@usdoj.gov)>

Subject: RE: [EXT] RE: US v. Lynch

Oriane,

For the items in below in blue, the government has in its possessions a laptop with Deloitte's proprietary software (AS/2). We have loaded onto the laptop Deloitte audit files relating to Autonomy received during the investigation. The laptop is available for review at the USAO. We attempted to make a copy in the *Hussain* case but that did not work because of Deloitte's proprietary software. During the *Hussain* case, Deloitte provided a second copy to the government, which was produced to Hussain's counsel. Hussain's counsel returned the copy to the government and we provided that copy to counsel for Mr. Chamberlain. We have requested Deloitte produce an additional laptop with AS/2 and the audit files. We will deliver it as soon as we receive it. In the meantime, what we have is available for review at the USAO.

I'm adding Chris and Kristina to the email chain.

Best regards,  
Bob

From: Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>

Sent: Monday, October 2, 2023 3:17 PM

To: [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

Cc: Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>; [Kyle.McLaughlin@CliffordChance.com](mailto:Kyle.McLaughlin@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com); Reeves, Adam (USACAN) <[AReves@usa.doj.gov](mailto:AReves@usa.doj.gov)>

Subject: FW: [EXT] RE: US v. Lynch

Hi Oriane – here you go, please see the response in the last column (highlighted in yellow and blue), I will be sending you the link in a minute.

Thanks,

BEGINNING BATES NUMBER	ENDING BATES NUMBER	SOURCE	DESCRIPTION	e-FOLDER NAME	DOJ PRODUCTION INDEX	RESPONSE
LAPTOP01	LAPTOP02	Deloitte	(2) Laptops, Deloitte workpapers	LAPTOP	2023.06.16. Index of Produced Documents.Rev01	LAPTOP Pending
HP-AB-00001685	HP-AB-00004369	Hewlett-Packard	Documents produced by HP	BAT0201_A	2023.05.19. Index of Documents Produced	ALL IMAGES ARE IN BAT0201, BAT0201_A DOES NOT EXIST
COVERLETTERS			Additional coverletters	BAT0206_A	2023.05.19. Index of Documents Produced	ALL IMAGES ARE IN BAT0206, BAT0206_A DOES NOT EXIST
DT-AS2 00323	DT-AS2 00340	Deloitte	Additional docs extracted from Deloitte laptop	BAT0227_A	2023.06.16. Index of Produced Documents	WILL REPRODUCE
COVERLETTERS		COVERLETTERS	Additional coverletters	BAT0206_A	2023.06.16. Index of Produced Documents	ALL IMAGES ARE IN BAT0206, BAT0206_A DOES NOT EXIST
USAO 00003718	USAO 00004119	USAO	Transmittal letters [US v. Hussain]	DISCLTR001	2023.06.16. Index of Produced Documents	WILL REPRODUCE
EMC_GJ_000708		EMC Corporation	Email chain that includes discussions between EMC and Zantaz regarding developing an appliance.	EMC_GJ_000708	2023.06.16. Index of Produced Documents	WILL REPRODUCE IN .PDF FORMAT
HP-SEC-02141246	HP-SEC-02141251	Hewlett-Packard	Additional materials prepared by Chris Yelland	HP-SEC-02141246 - HP-SEC-02141251	2023.06.16. Index of Produced Documents	WILL REPRODUCE IN NATIVE FORMAT
HP-SEC-02340578	HP-SEC-02340672	Hewlett-Packard	Additional documents from HP regarding ASL	HP-SEC-02340578 - HP-SEC-02340672	2023.06.16. Index of Produced Documents	ONLY IMAGES ARE INCLUDED IN BAT0244, WILL REPRODUCE IN NATIVE FORMAT (.PDF, XLS)
HP-SEC-01830656		Hewlett-Packard	Investors who may have purchased shares of HP	HP-SEC-166	2023.06.16. Index of Produced Documents	WILL REPRODUCE
HP-SEC-02313621	HP-SEC-02313688	Hewlett-Packard	Company Employee Handbook for Autonomy	HP-SEC-191	2023.06.16. Index of Produced Documents	WILL REPRODUCE (LABELED INCORRECTLY) HP-SEC-02313621 - HP-SEC-02313688
HP-SEC-02349032	HP-SEC-02349318	Hewlett-Packard	Documents relating to the August 31, 2011 email authored by "Joe Bloggs," with subject line: "Industry Analysts Question Autonomy's OEM Revenues, the Value of Acquired Assets."	HP-SEC-212	2023.06.16. Index of Produced Documents	HP-SEC-212 IS INCLUDED IN THE HD PRODUCED 5/19/2023
LAPTOP03		Deloitte	AS2 audit files	LAPTOP	2023.06.16. Index of Produced Documents	LAPTOP Pending
HP-SEC-00739023	HP-SEC-00739944	Hewlett-Packard	Sushovan Hussain quarterly revenue spreadsheets ***these are natives (xls) ***SEE DISC ON FILE WITH BATES NUMBER "HP-SEC-01641731"	MISC NATIVES	2023.06.16. Index of Produced Documents	WILL REPRODUCE NATIVE FILES, FOLDER LABELED AS HP-SEC-01641731
HP-SEC-02141240	HP-SEC-02141245	Hewlett-Packard	"Application of Revenue Policies and work performed"	NATIVES ONLY	2023.06.16. Index of Produced Documents	WILL REPRODUCE NATIVES, FOLDER LABELED AS HP-SEC-02141240 - HP-SEC-02141245
MS-HP-SEC-00017885	MS-HP-SEC-00017885	Morgan Stanley	Spreadsheet, Autonomy-Zantaz Digital Safe Service, Proposed Morgan Stanley Worksheet	NATIVES ONLY	2023.06.16. Index of Produced Documents	INCLUDED IN T69102 – ADDONICS, FOLDER LABELED AS "MISC NATIVE FILES"
UK_LITIGATION - DVD		Hewlett-Packard	Documents produced in the UK litigation relating to Autonomy	UK_LITIGATION - DVD	2023.06.16. Index of Produced Documents	WILL REPRODUCE
USAO-SEC-EPROD-003753173	USAO-SEC-EPROD-003764531	SEC	Email correspondence between SEC and third parties and representatives of those parties	USAO-SEC-EPROD_20170726	2023.06.16. Index of Produced Documents	WILL REPRODUCE
VC00801	VC00819	Lankler Sifert & Wohl	Additional documents received from Vanessa Colomar.	VC00801 - VC00819	2023.06.16. Index of Produced Documents	BAT0260, INCLUDED IN THE FIRST HD OR INITIAL PRODUCTION, 5/20/2023
HP-SEC-02166029	HP-SEC-02166034	Hewlett-Packard	Summary of revenue adjustments, Q1 2009 and Q2 2011		2023.06.16. Index of Produced Documents	NATIVES, WILL REPRODUCE
HP-SEC-01504886		Hewlett-Packard	Native file of an .edc file. Encrypted version of the spreadsheet HP was able to decrypt on 11/19/14 and produce to JH via email as HP-SEC-01504886		2023.06.16. Index of Produced Documents	PENDING
HP-SEC-01592914	HP-SEC-01593910	Hewlett-Packard	Communication and information relevant to former and current Autonomy employees and former and current HP employees		2023.06.16. Index of Produced Documents	PENDING
US_GJX 00005269	US_GJX 00005271	USAO	GAP IN BATES NUMBERING (NO DOCS RELATED TO THIS BATES RANGE)		2023.06.16. Index of Produced Documents	GAP, AS INDICATED ON THE DESCRIPTION, NO DOCS RELATED TO THE BATES RANGE

From: [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>

Sent: Wednesday, September 13, 2023 2:15 PM

To: Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>

Cc: [Kyle.McLaughlin@CliffordChance.com](mailto:Kyle.McLaughlin@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>; [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com); Reeves, Adam (USACAN) <[AReves@usa.doj.gov](mailto:AReves@usa.doj.gov)>

**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

We realized we are also missing this item from the DOJ's production index:

BEGINNING BATES NUMBER	ENDING BATES NUMBER	SOURCE	DESCRIPTION	e-FOLDER NAME	DOJ PRODUCTION INDEX
LAPTOP01	LAPTOP02	Deloitte	(2) Laptops, Deloitte workpapers	LAPTOP	2023.06.16. Index of Produced Documents.Rev01

Thank you so much,  
Oriane

Direct Dial: +1 (212) 878-8052  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

**From:** Green, Oriane (Litigation-NY)  
**Sent:** Wednesday, September 13, 2023 2:26 PM  
**To:** 'Margen, Beth (USACAN)' <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Hi Beth,

I hope you've been doing well. We've had an opportunity to review the additional data you've sent over, as well as run further analysis on the initial hard drives of data which we received from the DOJ.

Our additional analysis suggests that we are still missing some of the data identified in the DOJ's production indices. Please see the chart below identifying the missing data.

BEGINNING BATES NUMBER	ENDING BATES NUMBER	SOURCE	DESCRIPTION	e-FOLDER NAME	DOJ PRODUCTION INDEX
HP-AB-00001685	HP-AB-00004369	Hewlett-Packard	Documents produced by HP	BAT0201_A	2023.05.19. Index of Documents Produced
COVERLETTERS			Additional coverletters	BAT0206_A	2023.05.19. Index of Documents Produced
DT-AS2 00323	DT-AS2 00340	Deloitte	Additional docs extracted from Deloitte laptop	BAT0227_A	2023.06.16. Index of Produced Documents
COVERLETTERS		COVERLETTERS	Additional coverletters	BAT0206_A	2023.06.16. Index of Produced Documents
USAO 00003718	USAO 00004119	USAO	Transmittal letters (US v. Hussain)	DISCLTR001	2023.06.16. Index of Produced Documents
EMC_GJ_000708		EMC Corporation	Email chain that includes discussions between EMC and Zantaz regarding developing an appliance.	EMC_GJ_000708	2023.06.16. Index of Produced Documents
HP-SEC-02141246	HP-SEC-02141251	Hewlett-Packard	Additional materials prepared by Chris Yelland	HP-SEC-02141246 - HP-SEC-02141251	2023.06.16. Index of Produced Documents
HP-SEC-02340578	HP-SEC-02340672	Hewlett-Packard	Additional documents from HP regarding ASL	HP-SEC-02340578 - HP-SEC-02340672	2023.06.16. Index of Produced Documents
HP-SEC-01830656		Hewlett-Packard	Investors who may have purchased shares of HP	HP-SEC-166	2023.06.16. Index of Produced Documents
HP-SEC-02313621	HP-SEC-02313688	Hewlett-Packard	Company Employee Handbook for Autonomy	HP-SEC-191	2023.06.16. Index of Produced Documents
HP-SEC-02349032	HP-SEC-02349318	Hewlett-Packard	Documents relating to the August 31, 2011 email authored by "Joe Bloggs," with subject line: "Industry Analysts Question Autonomy's OEM Revenues, the Value of Acquired Assets."	HP-SEC-212	2023.06.16. Index of Produced Documents
LAPTOP03		Deloitte	AS2 audit files	LAPTOP	2023.06.16. Index of Produced Documents
HP-SEC-00739023	HP-SEC-00739944	Hewlett-Packard	Sushovan Hussain quarterly revenue spreadsheets ***these are natives (.xls) ***SEE DISC ON FILE WITH BATES NUMBER "HP-SEC-01641731"	MISC NATIVES	2023.06.16. Index of Produced Documents
HP-SEC-02141240	HP-SEC-02141245	Hewlett-Packard	"Application of Revenue Policies and work performed"	NATIVES ONLY	2023.06.16. Index of Produced Documents
MS-HP-SEC-00017885	MS-HP-SEC-00017885	Morgan Stanley	Spreadsheet, Autonomy-Zantaz Digital Safe Service, Proposed Morgan Stanley Worksheet	NATIVES ONLY	2023.06.16. Index of Produced Documents
UK_LITIGATION - DVD		Hewlett-Packard	Documents produced in the UK litigation relating to Autonomy	UK_LITIGATION - DVD	2023.06.16. Index of Produced Documents
USAO-SEC-EPROD-003753173	USAO-SEC-EPROD-003764531	SEC	Email correspondence between SEC and third parties and representatives of those parties	USAO-SEC-EPROD_20170726	2023.06.16. Index of Produced Documents
VC00801	VC00819	Lankler Siffert & Wohl	Additional documents received from Vanessa Colomar.	VC00801 - VC00819	2023.06.16. Index of Produced Documents
HP-SEC-02166029	HP-SEC-02166034	Hewlett-Packard	Summary of revenue adjustments, Q1 2009 and Q2 2011		2023.06.16. Index of Produced Documents
HP-SEC-01504886		Hewlett-Packard	Native file of an .edc file. Encrypted version of the spreadsheet HP was able to decrypt on 11/19/14 and produce to JH via email as HP-SEC-01504886		2023.06.16. Index of Produced Documents
HP-SEC-01592914	HP-SEC-01593910	Hewlett-Packard	Communication and information relevant to former and current Autonomy employees and former and current HP employees		2023.06.16. Index of Produced Documents
US_GIX 00005269	US_GIX 00005271	USAO	GAP IN BATES NUMBERING (NO DOCS RELATED TO THIS BATES RANGE)		2023.06.16. Index of Produced Documents

Please let us know if you have any questions.

Best,  
Oriane

Direct Dial: +1 (212) 878-8052  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

**From:** Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)>  
**Sent:** Thursday, July 13, 2023 1:29 PM  
**To:** Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>; Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Hello Oriane -- in re with the 2<sup>nd</sup> set of inquiry, please see the column highlighted in yellow in response to the location of the discovery among the HDs sent: I don't have a response for the 1<sup>st</sup> row yet, will get back to you on that one.

Folder	Ranges	Category	Requirements for loading	RESPONSE
AU_0032 (appears to potentially be clawback production) BAT0110 BAT0134 BAT0184 BAT0245 BAT0246 BAT0248_A BAT0249 BAT0255 BAT0260 [VC006] BAT0264 BAT0265_A BAT0266; MLAT_AU_00021934 MLAT001 VOL011-A VOL014	VARIOUS	Loadfile has been received in LFP format and does not contain basic metadata (including Filename).  This format could be indicative of this data being an overlay or secondary production -- Luminance has however not received a previous production or overlapping Bates ranges for these folders.	To confirm whether a fuller data file (.dat) can be provided for the data or alternatively access to the original (non-overlay) productions.	

UK_LITIGATION - USB6	Unknown	ZIP files provided without decryption key / password.	Please provide decryption key / password.	SEE THE TEXT FILE INCLUDED ON THAT SAME SUB-FOLDER labeled as "Password" both password for the zips should be indicated on that text file, if it's not there, will resend it.
COLOMAR (VC00732-800)	VC00732 - VC00800	Luminance have received this Folder but not the full range.  We have received VC00786 – VC00800.	Please confirm whether we can expect to receive VC00732 – VC00785.	SEE HD: TRANSFER002 FOLDER: ODNH – 0008 A .pdf COPY is ALSO included on the subfolder, will resend if needed
BAT0266; MLAT_AU_00021934	MLAT_AU 00021698 – MLAT_AU 00105989	Luminance have received this Folder but not the full range.  We have received MLAT_AU 00072614 - MLAT_AU 00072849.	Please confirm whether we can expect to receive MLAT_AU 00021698 - MLAT_AU 00072613 and MLAT_AU 00072850 - MLAT_AU 00105989.	SEE HD: TRANSFER002 Folder: MLAT_AU_20190423 Range: MLAT_AU 00072850 - MLAT_AU 00105989.  SEE HD sent 05.20.2023 Folder: MLAT_AU_00021934 Range: MLAT_AU 00021698 - MLAT_AU 00072613
UK_LITIGATION – HDD9	Unknown	Luminance has not received this folder.	Please confirm whether we can expect to receive this folder.	SEE HD: TRANSFER004 SHOULD BE INCLUDED IN FOLDER: _DISCOVERY FILES [NOT IN ECLIPSE]

**From:** Oriane.Green@CliffordChance.com <Oriane.Green@CliffordChance.com>

**Sent:** Wednesday, July 12, 2023 9:11 AM

**To:** Margen, Beth (USACAN) <BMargen@usa.doj.gov>

**Cc:** Kylee.McLaughlin@CliffordChance.com; Leach, Robert (USACAN) <RLeach@usa.doj.gov>; Trish.Keats@CliffordChance.com; George.Bouknight@CliffordChance.com; Reeves, Adam (USACAN) <ADReeves@usa.doj.gov>

**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

Thank you – we're working to download this first tranche of data from your FTP now. Do you have any updates regarding the additional set of data we flagged on Monday?

Best,  
Oriane

Direct Dial: +1 (212) 878-8052  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

**From:** Margen, Beth (USACAN) <Beth.Margen@usdoj.gov>

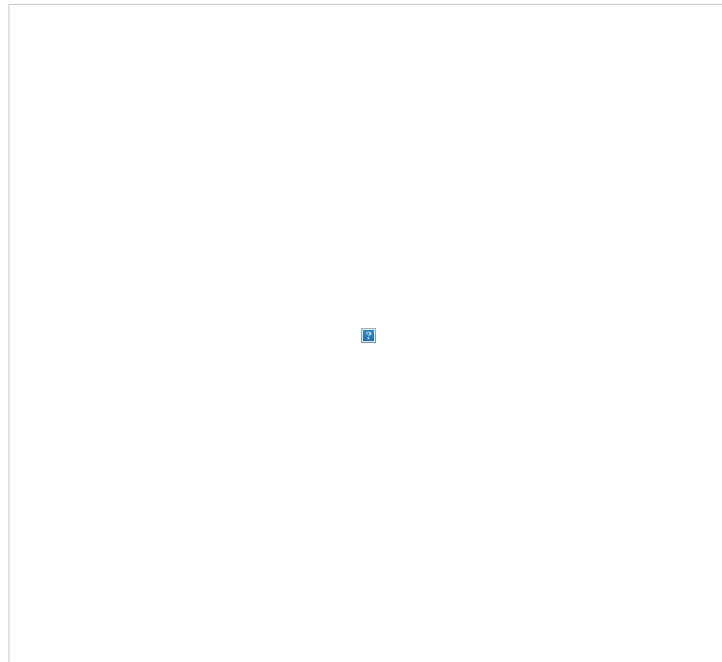
**Sent:** Wednesday, July 12, 2023 10:08 AM

**To:** Green, Oriane (Litigation-NY) <Oriane.Green@CliffordChance.com>

**Cc:** McLaughlin, Kylee (Litigation-NY) <Kylee.McLaughlin@CliffordChance.com>; Leach, Robert (USACAN) <Robert.Leach@usdoj.gov>; Keats, Trish (Litigation-NY) <Trish.Keats@CliffordChance.com>; Bouknight, George (Litigation-NY) <George.Bouknight@CliffordChance.com>; Reeves, Adam (USACAN) <Adam.Reeves@usdoj.gov>

**Subject:** RE: [EXT] RE: US v. Lynch

Good morning Oriane – I've send Trish and George, the link for the reproduction of those highlighted in yellow from your initial inquiry:



Thanks,

**From:** Oriane.Green@CliffordChance.com <Oriane.Green@CliffordChance.com>

**Sent:** Tuesday, July 11, 2023 10:55 AM

**To:** Margen, Beth (USACAN) <BMargen@usa.doj.gov>

**Cc:** Kylee.McLaughlin@CliffordChance.com; Leach, Robert (USACAN) <RLeach@usa.doj.gov>; Trish.Keats@CliffordChance.com; George.Bouknight@CliffordChance.com

**Subject:** [EXTERNAL] Re: [EXT] RE: US v. Lynch

Thanks for the update Beth, we really appreciate it.

Best,  
Oriane

Oriane Hakkila Green  
Associate  
Clifford Chance US LLP  
32 West 52nd Street  
New York, NY 10019  
Direct Dial: +1 (212) 878-8052 | Personal Dial: +1 (843) 345 8900  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

On Jul 11, 2023, at 1:46 PM, Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)> wrote:

Good morning Oriane – Apologies please, I am running a bit late uploading into our platform, still ongoing. As soon as I’ve finish, hopefully today, will send the link to Trish and George.

Thanks,  
Beth

---

**From:** Margen, Beth (USACAN)  
**Sent:** Monday, July 10, 2023 7:18 AM  
**To:** [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)  
**Cc:** [Kyile.McLaughlin@CliffordChance.com](mailto:Kyile.McLaughlin@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>; [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)  
**Subject:** RE: [EXT] RE: US v. Lynch

Hello Oriane – I will send Trish and George the link today, I’m just finishing up the last load. I will start looking up on the other queries and will help out in locating and resending.

Thanks,

---

**From:** [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>  
**Sent:** Monday, July 10, 2023 7:03 AM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>  
**Cc:** [Kyile.McLaughlin@CliffordChance.com](mailto:Kyile.McLaughlin@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>; [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com); [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)  
**Subject:** [EXTERNAL] Re: [EXT] RE: US v. Lynch

Hi Beth,

I hope you had a good weekend!

As we wait for the yellow highlighted e-Folders to be sent to George and Trish via USA FX per Bob's June 30<sup>th</sup> email below, we have both (1) searched for the blue highlighted e-Folders in the drives we received and (2) identified a handful of other queries for which we'd like your help resolving.

The below table represents the e-Folders about which we have queries that are described in the two right-most columns. The blue highlighted row represents the one e-Folder we were unable to identify in both the specified location in Bob's email (TRANSFER004 under folder 'DISCOVERY FILES [NOT IN ECLIPSE]') nor in any of the other drives. The remaining rows represent newly-identified queries.

Folder	Ranges	Category	Requirements for loading
AU_0032 (appears to potentially be clawback production) BAT0110 BAT0134 BAT0184 BAT0245 BAT0246 BAT0248_A BAT0249 BAT0255 BAT0260 [VC006] BAT0264 BAT0265_A BAT0266; MLAT_AU_00021934 MLAT001 VOL011-A VOL014	VARIOUS	Loadfile has been received in LFP format and does not contain basic metadata (including Filename).  This format could be indicative of this data being an overlay or secondary production – Luminance has however not received a previous production or overlapping Bates ranges for these folders.	To confirm whether a fuller data file (.dat) can be provided for the data or alternatively access to the original (non-overlay) productions.
UK_LITIGATION - USB6	Unknown	ZIP files provided without decryption key / password.	Please provide decryption key / password.
COLOMAR (VC00732-800)	VC00732 - VC00800	Luminance have received this Folder but not the full range.  We have received VC00786 – VC00800.	Please confirm whether we can expect to receive VC00732 – VC00785.
BAT0266; MLAT_AU_00021934	MLAT_AU 00021698 – MLAT_AU 00105989	Luminance have received this Folder but not the full range.  We have received	Please confirm whether we can expect to receive MLAT_AU 00021698 - MLAT_AU 00072613 and



		MLAT_AU 00072614 - MLAT_AU 00072849.	MLAT_AU 00072850 - MLAT_AU 00105989.
UK_LITIGATION – HDD9	Unknown	Luminance has not received this folder.	Please confirm whether we can expect to receive this folder.

Please let us know of any questions or if you'd like to discuss any of the above. Thank you as always for your help!

Best,  
Oriane

Oriane Hakkila Green  
Associate  
Clifford Chance US LLP  
32 West 52nd Street  
New York, NY 10019  
Direct Dial: +1 (212) 878-8052 | Personal Dial: +1 (843) 345 8900  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

On Jul 7, 2023, at 4:51 PM, Keats, Trish (Litigation-NY) <[Trish.Keats@cliffordchance.com](mailto:Trish.Keats@cliffordchance.com)> wrote:

Great, thanks so much!

Trish Keats  
Litigation Paralegal Case Manager  
CLIFFORD CHANCE US LLP  
31 West 52nd Street  
New York, NY 10019-6131  
Direct dial: 212 878 3310  
Fax: 212 878 8375  
[trish.keats@cliffordchance.com](mailto:trish.keats@cliffordchance.com)

---

**From:** Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)>  
**Sent:** Friday, July 7, 2023 4:48 PM  
**To:** Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>; Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Hi Trish, I've just sent a new invite. Thanks,

---

**From:** [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>  
**Sent:** Friday, July 7, 2023 12:44 PM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>; [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com); [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)  
**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth, happy Friday!

I'm so sorry, I didn't get a chance to set up my log in for your secure site and the link/token has expired. Would it be possible for you to send me a new invite?

Thank you!

Trish Keats  
Litigation Paralegal Case Manager  
CLIFFORD CHANCE US LLP  
31 West 52nd Street  
New York, NY 10019-6131  
Direct dial: 212 878 3310  
Fax: 212 878 8375  
[trish.keats@cliffordchance.com](mailto:trish.keats@cliffordchance.com)

---

**From:** Margen, Beth (USACAN) <[Beth.Margen@usdoj.gov](mailto:Beth.Margen@usdoj.gov)>  
**Sent:** Wednesday, July 5, 2023 9:28 AM  
**To:** Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; Bouknight, George (Litigation-NY) <[George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com)>; Keats, Trish (Litigation-NY) <[Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)>  
**Cc:** McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>  
**Subject:** RE: [EXT] RE: US v. Lynch

Thank you Oriane,

Hello George and Trish, I will create an account with our transfer platform and will send you an access to the record once I'm done loading.

Best,

---

**From:** [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>  
**Sent:** Monday, July 3, 2023 8:41 AM  
**To:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>; [George.Bouknight@CliffordChance.com](mailto:George.Bouknight@CliffordChance.com); [Trish.Keats@CliffordChance.com](mailto:Trish.Keats@CliffordChance.com)  
**Cc:** [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com); Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>  
**Subject:** [EXTERNAL] Re: [EXT] RE: US v. Lynch

Hi Bob and Beth,

Thank you for your follow-up.

@Beth - I've copied in @George and @Trish who can coordinate with you re the USA FX download.

Happy 4th!

Best,  
Oriane

Oriane Hakkila Green  
Associate  
Clifford Chance US LLP  
32 West 52nd Street  
New York, NY 10019  
Direct Dial: +1 (212) 878-8052 | Personal Dial: +1 (843) 345 8900  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

On Jun 30, 2023, at 3:51 PM, Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)> wrote:

Dear Oriane and Kylie:

We have looked into this. Please see the table below. For the yellow highlighted cells, we will provide them via USA FX, our file sharing service. Please work with Beth to get signed up if you are not already.

For the blue highlighted cells, we believe they were on the drives that were sent. We indicate the particular drives where the folders should be. Can you please check again? If that is unsuccessful, I understand we can re-copy them and either produce on another drive or upload to USA FX.

Please note, the e-folder SF-03853 is a reference to the SEC investigation number, and includes documents that were obtained by the SEC and subsequently provided to DOJ. That is why there are not Bates numbers "SF-03853".

Have a good weekend,

Best regards,  
Bob

<image001.png>

---

**From:** [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>

**Sent:** Wednesday, June 28, 2023 3:26 PM

**To:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>; Christopher.Morvillo@CliffordChance.com <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>

**Cc:** Reeves, Adam (USACAN) <[AReves@usa.doj.gov](mailto:AReves@usa.doj.gov)>; Kylie.McLaughlin@CliffordChance.com <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>

**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Hi Beth,

Kylie and I will confer with you separately.

Thanks everyone,  
Oriane

Direct Dial: +1 (212) 878-8052  
[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)

---

**From:** Margen, Beth (USACAN) <[BMargen@usdoj.gov](mailto:BMargen@usdoj.gov)>

**Sent:** Wednesday, June 28, 2023 6:15 PM

**To:** Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>; Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>

**Cc:** Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>; Green, Oriane (Litigation-NY) <[Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com)>; McLaughlin, Kylie (Litigation-NY) <[Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)>

**Subject:** RE: [EXT] RE: US v. Lynch

Ok, Chris, just send me the list and will help in locating the docs.

Thanks,

---

**From:** [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>

**Sent:** Wednesday, June 28, 2023 1:17 PM

**To:** Leach, Robert (USACAN) <[RLeach@usa.doj.gov](mailto:RLeach@usa.doj.gov)>

**Cc:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>; Reeves, Adam (USACAN) <[AReves@usa.doj.gov](mailto:AReves@usa.doj.gov)>; [Oriane.Green@CliffordChance.com](mailto:Oriane.Green@CliffordChance.com); [Kylie.McLaughlin@CliffordChance.com](mailto:Kylie.McLaughlin@CliffordChance.com)

**Subject:** [EXTERNAL] RE: [EXT] RE: US v. Lynch

Thanks very much, Bob. Nice to meet you Beth.

Copying Oriane Green and Kylie McLaughlin from my team who are assisting with our analysis. We will be in touch soon with an initial list of what, at the moment, we have not located.

Best,  
Chris

**Christopher J. Morvillo**  
CLIFFORD CHANCE US LLP  
31 West 52nd Street | New York, NY 10019  
(o) +1 212 878 3437 | (c) +1 917 753 0753

[christopher.morvillo@cliffordchance.com](mailto:christopher.morvillo@cliffordchance.com)

---

**From:** Leach, Robert (USACAN) <[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)>

**Sent:** Wednesday, June 28, 2023 4:03 PM

**To:** Morvillo, Christopher (Regulatory/White Collar-NY) <[Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)>

**Cc:** Margen, Beth (USACAN) <[BMargen@usdoj.gov](mailto:BMargen@usdoj.gov)>; Reeves, Adam (USACAN) <[Adam.Reeves@usdoj.gov](mailto:Adam.Reeves@usdoj.gov)>

**Subject:** [EXT] RE: US v. Lynch

Chris,

Just following up on our call touching on discovery. If there are materials you are unable to locate on the drives, be sure to copy Beth Margen, our paralegal, as she will be assisting with any response.

Best,  
Bob

---

**From:** Leach, Robert (USACAN)  
**Sent:** Friday, June 16, 2023 4:10 PM  
**To:** [Christopher.Morvillo@CliffordChance.com](mailto:Christopher.Morvillo@CliffordChance.com)  
**Cc:** Margen, Beth (USACAN) <[BMargen@usa.doj.gov](mailto:BMargen@usa.doj.gov)>; Reeves, Adam (USACAN) <[AReves@usa.doj.gov](mailto:AReves@usa.doj.gov)>  
**Subject:** US v. Lynch

Chris,

Here are the password instructions for the discovery that went out today.

Please let me and Beth know if you have issues accessing it.

Best,  
Bob

\*\*\*\*\*

HD Password & Instructions:

1. HD labeled as TRANSFER002: **450GoldenGate!** (password for the HD)
1. HD labeled as TRANSFER003: **450GoldenGate\$** (password to access the documents)  
**1024368** (to open the HD)
1. HD labeled as TRANSFER004: please follow the instruction below:

<image002.png>

1. Addonics T69102: no password required, Key for the HD will be sent out separately.

\*\*\*\*\*

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